

1 GEORGE D. YARON, ESQ. (NV State Bar #007959)
2 KEITH E. PATTERSON, ESQ. (CA State Bar #225753)

3 *Admitted Pro Hac Vice*

4 **YARON & ASSOCIATES**

5 1300 Clay Street, Suite 800

6 Oakland, CA 94612

7 Telephone: (415) 658-2929

8 Facsimile: (415) 658-2930

9 PAMELA A. McKAY, ESQ. (NV State Bar #7812)

10 **McKAY LAW FIRM, Chtd.**

11 3295 N. Fort Apache Rd., Suite 150

12 Las Vegas, NV 89129

13 Telephone: (702) 835-6956

14 Facsimile: (702) 835-6957

15 Attorneys for Defendant CLAUSING INDUSTRIAL, INC.

16 UNITED STATES DISTRICT COURT

17 DISTRICT OF NEVADA

18 CHARLIE RESOSO,

19 Plaintiff,

20 vs.

21 CLAUSING INDUSTRIAL, INC.; ANILOX
22 ROLL COMPANY, INC. d/b/a ARC
23 INTERNATIONAL, INCLUSIVE,

24 Defendants.

25 CLAUSING INDUSTRIAL, INC.,

26 Cross-Claimant,

27 vs.

28 ANILOX ROLL COMPANY, INC. d/b/a
ARC INTERNATIONAL,

Cross-Defendant.

CASE NO. 2:14-cv-00102-RFB GWF

STIPULATION REGARDING
THE FILING DEADLINE FOR
OPPOSITIONS TO ANILOX
ROLL COMPANY, INC.'S
MOTION FOR SUMMARY
JUDGMENT

1 IT IS HEREBY AGREED BY AND BETWEEN Plaintiff CHARLIE RESOSO ("Plaintiff"), by
2 and through his attorney of record, WILLIAM R. BRENSKE, ESQ., of the Law Office of William R.
3 Brenske, Defendant CLAUSING INDUSTRIAL, INC. ("Clausing"), by and through its attorneys of
4 record, GEORGE D. YARON, ESQ. and KEITH E. PATTERSON, ESQ., of the law firm of Yaron &
5 Associates, and ANILOX ROLL COMPANY, INC., d/b/a ARC INTERNATIONAL ("Anilox"), by and
6 through its attorneys of record, GRIFFITH H. HAYES, ESQ. and KEIVAN A. ROEBUCK, ESQ. of
7 Litchfield Cavo, LLP, that:

8 1. Defendant Anilox has filed a Motion for Summary Judgment ("Motion"). The parties had
9 previously mutually agreed that the deadline to file the Response to the Motion was
10 February 23, 2018.

11 2. Because of a family medical emergency concerning one of Anilox's FRCP 30(b)(6) deponents,
12 Anilox needed to move the FRCP 30(b)(6) deposition to a later date. Anilox produced five
13 witnesses pursuant to requests from counsel for Plaintiff and Clausing. The depositions of the
14 witnesses did not conclude until January 24, 2018.

15 3. The Court Reporter indicated that the transcripts from Anilox's FRCP 30(b)(6) deposition would
16 be ready by February 5, 2018. In order to adequately respond to Anilox Roll Company, Inc.'s
17 Motion, the transcripts need to be reviewed by counsel and the parties' experts. However, the
18 transcripts have not been completed by the Court Reporter.

19 4. Counsel for Plaintiff and counsel for defendant Clausing have requested Counsel for Anilox to
20 voluntarily agree that Plaintiff and Clausing may have additional time to file a response to Anilox's
21 Motion. Anilox does not object to and agrees to this request by counsel for Plaintiff and counsel
22 for Clausing. Further, the parties hereby stipulate that Plaintiff and Clausing shall have until
23 March 12, 2018, to file a Response to Anilox's Motion. The reply of Anilox to these responses
24 will be due April 4, 2018.

25 ///


26 ///

27 ///

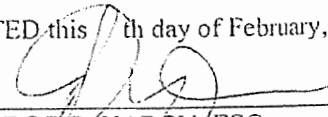
28 ///

1 The undersigned respectively have the authority to execute this Stipulation and bind the respective
2 parties hereto.

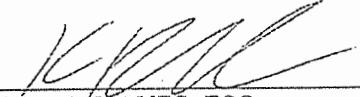
3
4 DATED this 14th day of February, 2018

5 By: 
6 WILLIAM R. BRENSKE, ESQ.
7 Nevada Bar No. 1806
8 RYAN D. KRAMETBAUER
9 Nevada Bar No. 12800
10 LAW OFFICE OF WILLIAM R. BRENSKE
11 3800 Howard Hughes Parkway, Suite 500
12 Las Vegas, Nevada 89169
13 Attorneys for Plaintiff Charlie Resoso
14
15

DATED this 17th day of February, 2018

By: 
GEORGE D. YARON, ESQ.
Nevada Bar No. 007959
KEITH E. PATTERSON, ESQ.
California Bar No. 225753
Admitted Pro Hac Vice (Nevada)
YARON & ASSOCIATES
1300 Clay Street, 8th Floor
Oakland, California 94612
Attorneys for Clausing Industrial, Inc.
-AND-
PAMELA A. MCKAY, ESQ.
Nevada Bar No. 7812
MCKAY LAW FIRM, CHTD.
3295 N. Fort Apache Rd., Suite 150
Las Vegas, Nevada 89129
Attorneys for Clausing Industrial, Inc.

16 DATED this 13th day of February, 2018

17
18 By: 
19 GRIFFITH H. HAYES, ESQ.
20 Nevada Bar No. 7374
21 KEIVAN A. ROEBUCK, ESQ.
22 Nevada Bar No. 14110
23 LITCHFIELD CAVO LLP
24 3993 Howard Hughes Parkway, Suite 100
25 Las Vegas, Nevada 89169
26 Attorneys for Defendant
27 Anilox Roll Company, Inc., d/b/a ARC International
28

IT IS SO ORDERED.

DATED this 16th day of February 2018.



UNITED STATES DISTRICT JUDGE

1 **CERTIFICATE OF SERVICE**

2 I am over 18 years of age and not a party to the within action. I am employed in the County
3 of Alameda; my business address is Yaron & Associates, 1300 Clay Street, Suite 800, Oakland,
4 California 94612.

5 On **February 15, 2018**, I served the within:

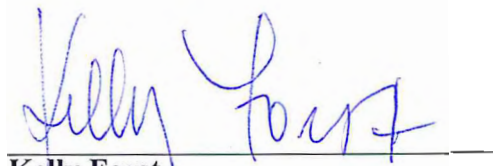
6 **STIPULATION REGARDING THE FILING DEADLINE FOR OPPOSITIONS TO**
7 **ANILOX ROLL COMPANY, INC.'S MOTION FOR SUMMARY JUDGMENT**

8 on all parties in this action, as addressed below, by causing a true copy thereof to be distributed as
9 follows:

10 *TO ALL PARTIES ON THE ECF SERVICE LIST*

11 ✕ **VIA ELECTRONIC SERVICE:** I served a true copy, with all exhibits, electronically on designated
12 recipients through PACER. Upon completion of electronic transmission of said document(s), a receipt is issued
13 to serving party acknowledging receipt by PACER's system. Once PACER has served all designated recipients,
14 proof of electronic service is returned to the filing party which will be maintained with the original document(s)
15 in our office. This service complies with CCP §101.6.

16 I declare under penalty of perjury under the laws of the State of California that the foregoing
17 is true and correct, and that this declaration was executed on **February 15, 2018**, at Oakland,
18 California.

19 
20 **Kelly Forst**
21 Kforst@yaronlaw.com